

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

V.

CAROLYN JEAN CASSAR,

Defendant.

)))))))))

INDICTMENT

CR 13-80 JNE/SER

18 U.S.C. § 1343

18 U.S.C. § 981(a)(1)(C)

28 U.S.C. § 2461(c)

THE UNITED STATES GRAND JURY CHARGES THAT:

BACKGROUND

1. At all relevant times, Defendant CAROLYN JEAN CASSAR was a resident of the State of Minnesota.

2. Beginning in or about November 2008 and at all subsequent relevant times, the defendant was the sole owner of a checking account at Wells Fargo Bank, N.A. (“Wells Fargo”). In connection with this account, the defendant was issued a Wells Fargo Visa debit card.

COUNT 1
(Wire Fraud)

3. The Grand Jury incorporates paragraphs 1 and 2 as if fully set forth herein.

4. From in or about May 2006 through in or about September 2012, in the State and District of Minnesota, the defendant,

CAROLYN JEAN CASSAR,



FILED APR 15 2013
RICHARD D. SLETTEN, CLERK
JUDGMENT ENTERED _____
DEPUTY CLERK'S INITIALS _____

devised and intended to devise a scheme and artifice to defraud and to obtain money by means of materially false and fraudulent pretenses, representations, promises, and material omissions.

5. It was part of the scheme to defraud that the defendant fraudulently induced elderly victims L.C. and H.C. to provide the defendant with money, including by falsely and fraudulently representing, among other things, that:

a. The defendant needed money to travel to Washington, D.C. and to pay expenses related to her daughter's death, and to settle her daughter's affairs;

b. The defendant needed money to travel to Italy because her ex-husband was on trial in Italy for killing the defendant's sister;

c. The defendant needed money to travel to Italy to prosecute a former business agent who defrauded the defendant and for associated legal fees; and

d. The defendant anticipated that at the conclusion of the lawsuit in Italy against her former business agent, the defendant would receive back the money that she inherited from her father, which the business agent stole from her, and would then repay the victims.

6. It was further part of the scheme to defraud that the defendant concealed and omitted material facts, including not telling victims L.C. and H.C. that:

a. The defendant's daughter was not deceased;

b. The defendant's sister was not deceased and the defendant's ex-husband was not prosecuted in Italy;

c. The defendant did not have a lawsuit in Italy against a former business agent;

d. The defendant did not receive an inheritance from her father;

e. The defendant used the victims' money to vacation in Europe with her son and others, and to take architecture and design professionals to Italy to look at architecture in order to design a house for the defendant; and

f. The defendant used the victims' money to pay an architect to draw plans for an Italian-style villa for the defendant.

7. It was further part of the scheme to defraud that the defendant provided the victims with airline itineraries for her flights to Italy. The victims relied upon the fact that the defendant repeatedly traveled to Italy as indicating that the defendant's representations about the court cases in Italy against her ex-husband and former business agent were true and accurate.

8. Through this scheme, the defendant obtained a total of approximately \$840,000 from victims L.C. and H.C. in more than 375 transactions.

9. On or about September 12, 2011, in the State and District of Minnesota, the defendant,

CAROLYN JEAN CASSAR,

for the purpose of executing the above-described scheme and artifice, did knowingly cause to be transmitted in interstate commerce, by means of wire communication, certain writings, signs, signals and sounds; to wit: a Wells Fargo Visa debit card purchase of an

American Airlines ticket to Italy in the amount of \$513.80, which was routed across state lines for authorization; in violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATIONS

10. Count 1 of this Indictment is hereby re-alleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

11. As the result of the offense alleged in Count 1 of this Indictment, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Section 1343.

12. If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

13. All in violation of Title 18, United States Code, Sections 981(a)(1)(C) and 1343, and Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON